

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TREVOR KEVIN BAYLIS,
Plaintiff, (*pro se*).
v.
VALVE CORPORATION,
Defendant.

Case No. 2:23-cv-01653-RSM

**DECLARATION OF BAYLIS
IN SUPPORT OF PLAINTIFF'S
MOTION TO STRIKE DEFENDANT
VALVE CORPORATION'S
NINTH DEFENSE TO
PLAINTIFF TREVOR KEVIN
BAYLIS' SECOND AMENDED
COMPLAINT**

I, Trevor Kevin Baylis, declare as follows:

1. I am a professional 3D artist and animator. I represent myself as Plaintiff (“Baylis”) in this matter. I am fifty six years old and have personal knowledge of the facts stated below. I am otherwise competent to testify and, if called upon to testify on the matters herein, would do so consistently with this declaration.

2. Attached hereto as Exhibit A is a true and correct copy of Iron Sky film End Credits showing Trevor Baylis at the top of the list of VFX artists denoting his senior position in the creation and authorship of the film. Baylis was NOT an “intern” or amateur but a professional artist.

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3. Attached hereto as Exhibit B is a true and correct copy of email exchanges Baylis had with Jonah O. Harrison (and others) attorney at the law firm Arete Law Group PLLC. Who represent Defendant Valve Corporation (“Valve”) in this matter. Wherein, on 29th of March 2024, Baylis offers to demonstrate original Iron Sky animation files to Valve via a shared screen Zoom ‘Meet and Confer’.

4. Attached hereto as Exhibit C is a true and correct copy of a Machine Translation of Tekijänoikeusneuvosto TN 2018:12 as mention by Petri Gunther as an example of 3D animation works that receive copyright protection in Finland in his Kluwer Copyright Blog: Finnish court rules on copyright in the film ‘Iron Sky’ (see #Dkt. 44, Harrison Decl., Ex. H at p. 2-3 of 13).

5. Attached hereto as Exhibit D is a true and correct copy Baylis' Trevi Tyger Character Manual mentioned in Tekijänoikeusnevostot TN 2018:12 page 1 Paragraph 1.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed in Tampere, Finland on this 16th day of April, 2024.

Trevor K Baylis

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1
2 CERTIFICATE OF SERVICE FORM
3 FOR ELECTRONIC FILINGS

4 I hereby certify that on 24th April 2024 I electronically filed the foregoing document
5 with the United States District Court
6 Western District of Washington at Seattle by using the

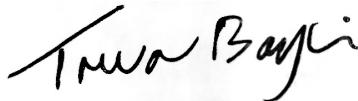
7 CM/ECF system. I certify that the following parties or their counsel of
8 record are registered as ECF Filers and that they will be served by the

9 CM/ECF system:

10 Jeremy E Roller: jroller@aretelaw.com,
11 jfischer@aretelaw.com,
12 kgreenberg@aretelaw.com

13
14 Jonah O. Harrison: jharrison@aretelaw.com,
15 jfischer@aretelaw.com,
16 kgreenberg@aretelaw.com

17
18 Dated: 24th April 2024

19
20 

21 Trevor Kevin Baylis

22 Jankanraitti

23 Tampere 33560, FINLAND

24 DECLARATION OF BAYLIS IN SUPPORT OF PLAINTIFF'S
MOTION TO STRIKE DEFENDANT VALVE CORPORATION'S
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